Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
AIRCELL, INC.	)	Docket No. 02-86
	)	DA 03-721
Petition for Extension of Waiver	)	

To: The Commission

REPLY COMMENTS REGARDING
PETITION FOR EXTENSION OF WAIVER

AT&T WIRELESS SERVICES, INC.,
CINGULAR WIRELESS LLC,
CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS

Kathryn A. Zachem
L. Andrew Tollin
Michael Deuel Sullivan
WILKINSON BARKER KNAUER, LLP
2300 N Street, N.W., Suite 700
Washington, D.C. 20037-1128
(202) 783-4141

Douglas I. Brandon
AT&T WIRELESS SERVICES, INC.
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 223-9222

J.R. Carbonell
Carol L. Tacker
David G. Richards
CINGULAR WIRELESS LLC
5565 Glenridge Connector
Suite 1700
Atlanta, GA 30342
(404) 236-6030

John T. Scott, III
CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS
1300 I Street, N.W.
Suite 400-W
Washington, D.C. 20005
(202) 589-3760

June 9, 2003

TABLE OF CONTENTS

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
AIRCELL, INC.	)	Docket No. 02-86
	)	DA 03-721
Petition for Extension of Waiver	)	

To: The Commission

REPLY COMMENTS REGARDING
PETITION FOR EXTENSION OF WAIVER

AT&T Wireless Services, Inc. ("AWS"), Cingular Wireless LLC ("Cingular"), and Cellco Partnership d/b/a Verizon Wireless ("Verizon") (collectively, "Commenters") hereby submit their reply comments in response to comments filed April 10, 2003 by AirCell, Inc. ("AirCell"), Rural Cellular Corporation ("RCC"), Rural Cellular Association ("RCA"), and Lucent Technologies, Inc, ("Lucent"). AirCell has requested that the original waiver be made permanent; that the 6-channel limitation be expanded to 19 channels; and that it be allowed to use any cellular frequency, whether or not a carrier is using it for digital service.

I. REPLY TO COMMENTS OF AIRCELL, RCC, AND RCA

AirCell makes three general points in its comments, none of which justifies continuing or expanding the original waiver.[1]

[1] RCC and RCA do not provide any new substantive arguments in favor of the waiver extension petition. For the most part, they reiterate points already made by AirCell.

A. Intervening FCC Rulings Do Not Bolster AirCell's Case for Extension

AirCell's first point is that the FCC has issued several rulings favorable to AirCell since it filed its petition, and that these rulings somehow support extension of the waiver. It is readily apparent that four of these rulings contribute nothing to the case for a waiver extension:

- In *AirCell, Inc.,* 17 F.C.C.R. 8258 (WTB 2002), the Bureau deferred comments on AirCell's extension petition pending the FCC's issuance of an order on remand from the D.C. Circuit.[2] This was not a "favorable ruling" to AirCell. It was merely a procedural order. In its waiver extension petition, AirCell relied on the reasoning of FCC decisions remanded by the Court; this order merely ensured that the FCC's response to the remand could be considered in comments.
- In *AirCell, Inc.,* 17 F.C.C.R. 19,586 (WTB 2002), the Bureau denied the Commenters' request for declaratory ruling about apparent AirCell activities that would violate the Commission's rules, AirCell's waiver, and the terms of AirCell's experimental license. These activities included the operation of ordinary cellphones aboard airplanes and the installation of cellular-band blocking and jamming equipment aboard aircraft. After AirCell denied that it had performed any testing outside a laboratory setting and affirmed that it would need to seek a further waiver to implement these plans, the Bureau ruled that no declaratory ruling was needed. The order confirmed, however, that Commenters were correct in that AirCell was not permitted to operate ordinary cellphones or blocking and jamming devices aboard aircraft.
- In an October 11, 2002 letter,[3] the Office of Engineering and Technology found that no action was warranted in response to letters from Commenters regarding the adequacy of AirCell's experimental program, as described in AirCell's periodic experimental reports. This obviously has no relationship to the merits of AirCell's petition for extension of its waiver.
- In a February 12, 2003 public notice, the Bureau granted an additional "me too" waiver, thereby adding CC Communications to the list of cellular licensees allowing AirCell to use their licensed fa-

---

[2] *AT&T Wireless Services, Inc. v. FCC,* 270 F.3d 959 (D.C. Cir. 2001) (*AWS v. FCC*), *remanding AirCell, Inc.,* 15 F.C.C.R. 9622 (2000) (*AirCell Order*), *aff'g AirCell, Inc.,* 14 F.C.C.R. 18,430 (WTB 1999) (*Reconsideration Order*); 14 F.C.C.R. 806 (WTB 1998) (*Bureau Order*).

[3] Letter from J. Burtle, Chief, Experimental Licensing Branch, Electromagnetic Compatibility Division, OET dated October 11, 2002.

> cilities as part of its network. As with all such "me too" waivers, this merely expanded the list of carriers subject to AirCell's outstanding waiver. It will be subject to whatever ruling emerges in response to the pending expansion petition and contributes nothing to its merits.

The fifth FCC ruling cited by AirCell, the FCC's February 10, 2003 *Remand Order,*[4] obviously has some relevance to the waiver request. It does not, however, "bolster" AirCell's extension petition, as AirCell claims.[5] In fact, it undermines AirCell's argument for renewal and extension of the waiver. Commenters have shown in a recent appellate filing that the explanation for the -117 dBm interference threshold in that order cannot be squared with the record, the initial grant of the waiver, the FCC's previous appellate defense of the waiver grant, or the Court's remand.[6] Commenters have already addressed the infirmities of the *Remand Order* and have shown that its analysis and conclusions are inapplicable now that a more extensive test record exists.[7] Commenters have also demonstrated that harmful interference results from AirCell operations even if AirCell's signal strength is compared to the new -110 dBm threshold used in that order for assessing the likelihood of harmful interference in the Texas tests.[8] In any event, the issues addressed in the *Remand Order* are involved in the pending review proceeding before the D.C. Circuit, *AT&T Wireless Services, Inc., et al. v. FCC,* Case No. 03-1043 (D.C. Cir. filed Feb. 26, 2003).

---

4 *AirCell, Inc., Order on Remand,* FCC 02-324 (Feb. 10, 2003), *petition for review pending sub nom. AT&T Wireless Services, Inc., et al. v. FCC,* Case No. 03-1043 (D.C. Cir. filed Feb. 26, 2003), *motion for summary reversal and vacatur pending* (filed April 21, 2003).

5 AirCell Comments at 10.

6 *See* Motion for Summary Reversal and Vacatur, *AT&T Wireless Services, et al. v. FCC,* Case No. 03-1043 (D.C. Cir. filed April 21, 2003).

7 *See* Comments in Opposition at 69-70; *see also id.,* Exhibit III (Remand Analysis).

8 *See id.* at 70-71, Exhibit III.

B. New Developments Do Not Justify Extending the Scope or Duration of the Waiver

Next, AirCell claims that its waiver should be expanded because of new developments. AirCell argues that its sales growth justifies expansion of the waiver. In fact, the growing number of installed AirCell phones is a reason for heightened skepticism about whether AirCell's authority should be expanded. In August 2001, AirCell told the Court that it had sold 700 phones; now it claims to have an installed base of 1300.[9] This does not support expansion of the waiver. Commenters have already shown that AirCell's existing 6-channel waiver gives it sufficient capacity for growth, given that six channels can accommodate seven times its projected demand.[10]

If AirCell operations in fact are capable of causing interference to terrestrial cellular service, then an increasing number of AirCell-equipped planes will increase the opportunities for such interference to occur. As Petitioners have shown in their Comments in Opposition, each AirCell-equipped plane *is* likely to cause *harmful* interference to multiple cellsites, and thus actual incidents of harmful interference will increase in proportion to the deployment and usage of AirCell's technology. Harmful interference is likely to occur often, instead of only occasionally, if AirCell grows. This is not a reason to lift the limits on AirCell; it is a reason to deny the extension of the waiver and terminate AirCell's operation.[11]

---

[9] *Compare* AirCell, Inc. Intervenor's Brief at 15, *AT&T Wireless Services, Inc. v. FCC,* No. 00-1304 (D.C. Cir. filed Aug. 2, 2001) *with* AirCell Comments at 12.

[10] *See* Comments in Opposition at 20-22. RCC argues that AirCell needs access to digital channels because it will be "severely constrained" if limited to analog channels. RCC Comments at 3-4. RCC's argument is unsupported by the facts. AirCell's actual demand for airtime is a few minutes per day at a typical cellsite and its own projected demand can be accommodated easily by six channels.

[11] AirCell opportunistically cites growing public safety usage of its system in the post-9/11 era as a reason for extending its waiver. It ignores, of course, the much more extensive reliance of public safety and homeland security officials on terrestrial cellular service, as well as the many thousands of E911 calls placed daily on cellular systems. The public interest does not warrant increasing the likelihood of harm-

(continued on next page)

AirCell touts its recent team-up with an in-flight medical emergency service provider in support of its extension petition. Again, this is not a ground for increasing AirCell's capacity. AirCell does not even say how many units are in use (or are projected to be used) by this provider. Moreover, it ignores the interference caused to terrestrial emergency services.

The last "new development" is AirCell's time-worn refrain that it has not received any interference complaints. As Commenters have explained many times before, it would not have received any such complaints even if its service causes harmful interference all the time, because cellular systems are not capable of determining when a call is interrupted or terminated due to AirCell's interference, as opposed to other conditions, and cannot in any event track interference by AirCell operations.[12] AirCell claims that all carriers have to do is identify channels with "an atypical level of interference events,"[13] but carriers' systems are not routinely set up to record such "interference events," much less identify them by channel and perform statistical analysis.[14] Moreover, AirCell has never explained how even continuous harmful interference from its service could be identified as "atypical" in a statistically significant way, when AirCell usage averages only a few minutes per day at each host site.

(footnote continued)

ful interference to the tens of millions of terrestrial cellphones to enable communications to the thousand or so planes with AirCell phones.

12 *See* Comments in Opposition at 16-17, Exhibit I at § 8.2.

13 AirCell Comments at 15 n.24.

14 RCA asserts that none of its rural carrier members, including AirCell partners and nonparticipating carriers, has "reported experiencing interference attributable to AirCell system operations." RCA comments at 2. RCA does not, however, claim that its members have the capability to attribute any interference actually detected to AirCell operations if that was its source. It also does not claim that its members have investigated and determined the source of all instances of interference in order to rule out AirCell as the source of interference in each case.

C. AirCell Fails to Show That the Waiver Should Be Extended

AirCell's claim that it has satisfied the waiver standards in the rules[15] has already been addressed fully in the Comments in Opposition. The only new twist here is AirCell's attempt to ride the coattails of the FCC's Spectrum Policy Task Force.[16] We note in this connection that AirCell's operation is not consistent with the "interference temperature" concept for secondary unlicensed operations, because that would permit such operations below a level approximating the noise floor.[17] The record is clear that AirCell's received signal strength at terrestrial base stations is well above the noise floor, and in fact is high enough to cause harmful interference.

AirCell also touts the purported "public interest" benefits of its service.[18] It is revealing, however, that the first point it discusses under this heading is its own "viability as a going concern."[19] Whatever public benefits AirCell may provide, they do not outweigh the harmful interference that its operations are causing and will cause to terrestrial cellular customers and opera-

---

15 AirCell Comments at 17-21.

16 *Id.* at 19-20.

17 Spectrum Policy Task Force Report, ET Docket No. 02-135, at 28-39 (Nov. 1, 2002). Under the interference temperature model, the Commission would determine the "'worst case' environment in which a receiver would be expected to operate" based on the noise floor. *Id.* at 28. This "worst case environment" would establish the interference temperature for services operating on the band. The Commission would then create underlays to permit unlicensed operations below the interference temperature in spectrum previously awarded via an exclusive licensing process. In other words, only the licensee could operate above the interference temperature and unlicensed operations would be permitted only below that level.

18 AirCell Comments at 21-24. In addition, RCC argues that the digital restriction on AirCell should be lifted because AirCell has "thoroughly tested" its potential interference to TDMA and CDMA systems. RCC Comments at 3. AirCell has not, however conducted thorough tests of such interference. The Commenters have already shown that AirCell's "tests" did not involve any new flight test data and did not combine either actual or simulated AirCell interference with actual terrestrial drive-test signals. AirCell's showings were flawed in many other ways, as well. Moreover, RCC ignores the fact that AirCell has not done any tests, thorough or otherwise, regarding its potential interference to GSM. *See* Comments in Opposition at 22-35.

19 AirCell Comments at 22.

tors, all of whom provide substantial "public service" benefits (*e.g.,* E911 service). Expanding the number of channels used by AirCell puts these services at risk.[20]

II. REPLY TO LUCENT'S COMMENTS

As a vendor, Lucent cooperated with Commenters and their consultant, V-Comm, on the tests that V-Comm conducted. Its comments provide an independent technical perspective that validates the approach taken to the tests described in the Comments in Opposition filed by the Commenters. Lucent's perspective is particularly valuable because it is, in effect, the heir to the invention of cellular service, which was developed and tested in its early days by Bell Laboratories, which is now part of Lucent. This heritage, together with the fact that Lucent equipment was used for the test, makes it uniquely qualified to assess the test results.

It is noteworthy that Lucent finds that the V-Comm test results and analysis are a fair test of AirCell's interference potential, stating that the test procedures "bias the data analysis in AirCell's favor, since larger levels of interference are required in order to declare performance degradation with confidence."[21] Lucent finds that there is very statistically significant interference shown at some levels. For example, Lucent finds a high (95%) confidence level regarding the measured increase in interference to a TDMA system from -117 to -114 dBm, which causes

---

[20] RCA's Comments emphasize the benefits of competitive provision of air-ground service, given that there is only one licensed provider of such service for commercial aircraft. RCA Comments at 3. RCA does not explain, however, why cellular frequencies should be used for such competition, given the demonstrable risk of harmful interference, especially since five of the six national licenses for 800 MHz air-ground service are unoccupied. *See Amendment of Part 22 to Benefit the Consumers of Air-Ground Telecommunications Services,* WT Docket 03-103, *Notice of Proposed Rulemaking,* FCC 03-95 (April 28, 2003).

[21] Lucent Comments at 8.

"degradation in blocked call rate."[22] Lucent notes that such interfering signal levels are produced by an AirCell call "within a 10-15 mile radius" at about a 5000 foot altitude.[23]

Lucent endorses V-Comm's case study as a productive way to measure the extent of the interference. Lucent notes that this approach allows the interplay of multiple factors to be examined in determining the number of cells that would be affected by a hypothetical flight.[24]

Lucent's white paper should be quite helpful to the Commission in evaluating AirCell's effect on digital service.. In particular, this paper addresses the effect of external noise on CDMA systems. Lucent summarizes some of the most relevant points from the paper as follows:

> [T]o maintain call quality when there is an increase in base station receiver noise caused by external interference, it is necessary to reduce the maximum allowable loss and the associated cell coverage, or reduce the loading (number of subscribers) supported by the system. Practically, if it is desired to maintain system capacity, a reduction in cell size is necessary. Similarly, a desire to retain a given cell size will require a reduction in system capacity.[25]

Thus, AirCell's interference to CDMA systems presents CDMA carriers with a Hobson's choice: either (1) reduce cell size to maintain capacity, which will result in an increase in capital expenditures to maintain system coverage; or (2) maintain system coverage, which will result in a reduction in system capacity and an increase in call blocking rates, which could preclude the completion of 911 calls. The public interest in precluding CDMA carriers from having to choose one of those options clearly outweighs extension of the waiver.

---

22 *Id.*

23 *Id.* at 9.

24 *Id.*

25 Lucent Comments at 11; *see id.,* Attachment, *Impact of External Interference on CDMA* (May 24, 2002).

CONCLUSION

For the reasons set forth above and in the Comments in Opposition, the Petition filed by AirCell and its Partners for extension of their waiver of the airborne cellular rule must be denied in its entirety.

Respectfully submitted,

AT&T WIRELESS SERVICES, INC.,
CINGULAR WIRELESS LLC,
CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS

/S/ Michael Deuel Sullivan

By: Kathryn A. Zachem
L. Andrew Tollin
Michael Deuel Sullivan

WILKINSON BARKER KNAUER, LLP
2300 N Street, N.W., Suite 700
Washington, D.C. 20037-1128
(202) 783-4141

/S/ Douglas I. Brandon/mds

Douglas I. Brandon
AT&T WIRELESS SERVICES, INC.
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 223-9222

/S/ David G. Richards/mds

J.R. Carbonell
Carol L. Tacker
David G. Richards
CINGULAR WIRELESS LLC
5565 Glenridge Connector
Suite 1700
Atlanta, GA 30342
(404) 236-6030

/S/ John T. Scott III/mds

John T. Scott, III
CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS
1300 I Street, N.W.
Suite 400-W
Washington, D.C. 20005
(202) 589-3760

June 9, 2003.

Certificate of Service

I, Felicia Lane, hereby certify that copies of the foregoing "Reply Comments Regarding Petition For Extension Of Waiver" were served this 9th day of June, 2003 via first class U.S. mail on the following:

*Bryan Tramont, Senior Legal Advisor
Office of the Chairman Powell
Federal Communications Commission
445 12th Street, SW, Room 8-B201
Washington, DC 20554

*Barry Ohlson
Office of Commissioner Jonathan Adelstein
Federal Communications Commission
445 12th Street, SW, Room 8-C302
Washington, DC 20554

*Jennifer Manner
Office of Commissioner Kathleen Abernathy
Federal Communications Commission
445 12th Street, SW, Room 8-B115
Washington, DC 20554

*Paul Margie, Senior Legal Advisor
Office of Commissioner Michael Copps
Federal Communications Commission
445 12th Street, SW, Room 8-A302
Washington, DC 20554

*Samuel Feder, Senior Legal Advisor
Office of Commissioner Kevin Martin
Federal Communications Commission
445 12th Street, SW, Room 8-A204
Washington, DC 20554

*John Muleta, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 3-C252
Washington, DC 20554

*Peter Tenhula
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 2-C343
Washington, DC 20554

*David Furth, Associate Bureau Chief and
Counsel to the Bureau Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 4-C224
Washington, DC 20554

*John Branscome, Legal Advisor
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 3-C227
Washington, DC 20554

*William Kunze, Division Chief
Commercial Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 3-C207
Washington, DC 20554

*Katherine Harris
Deputy Chief, Legal
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 4-C236
Washington, DC 20554

*Jeffrey Steinberg, Deputy Chief
Commercial Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 3-C222
Washington, DC 20554

*Roger Noel
Licensing and Technical Analysis Branch
Commercial Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 4-B115
Washington, DC 20554

*Michael Ferrante
Commercial Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 4-C124
Washington, DC 20554

*B.C. "Jay" Jackson, Jr.
Commercial Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 4-C234
Washington, DC 20554

*Leon Jackler
Commercial Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 3-C207
Washington, DC 20554

*Blaise Scinto, Acting Chief
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 3-C124
Washington, DC 20554

*Tom Stanley
WTB Chief Engineer, Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 3-C124
Washington, DC 20554

*Edmond Thomas
Office of Engineering & Technology
Federal Communications Commission
445 12th Street, SW, Room 7-C250
Washington, DC 20554

*Qualex International
445 -12th Street, SW,
Room CY-B402
Washington, DC 20554

David L. Nace
Lukas Nace Gutierrez & Sachs, Chartered
1111 Nineteenth Street, NW, Suite 1200
Washington, DC 20036
Counsel for Cellular Network Partnership, A Limited Partnership d/b/a Pioneer Cellular

Michele C. Farquhar
Ronnie London
Hogan & Hartson, L.L.P
555 Thirteenth Street, NW
Washington, DC 20004
Counsel for AirCell, Inc. and Western Wireless Corp.

Nancy K. Spooner
Swidler Bnerlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, DC 20007-5116
Counsel for CenturyTel Wireless, Inc

Donald J. Evans
Fletcher, Heald & Hildreth
1300 North 17th Street, 11th Floor
Arlington, VA 22209
Counsel for Corr Wireless Communications, LLC

David Kaufman
Brown Nietert & Kaufman, Chartered
2000 L Street, NW, Suite 817
Washington, DC 20036
Commnet Wireless, Inc.

David L. Nace
Lukas Nace Gutierrez & Sachs, Chartered
1111 Nineteenth Street, NW, Suite 200
Washington, DC 20036
Counsel for ETEX Communications, L.P.

Harry H. Baker
CALIFORNIA RSA NO. 3 LIMITED PARTNERSHIP, a California limited partnership d/b/a GOLDEN STATE CELLULAR
17400 High School Road
Jamestown, California 95237

Robert M. Jackson
Blooston, Mordkofsky, Dickens Duffy & Prendergast
2120 L Street, NW, Suite 300
Washington, DC 20037
Counsel for Southern Illinois RSA Partnership d/b/a First Cellular of Southern Illinois

Sylvia Lesse
Kraskin Lessee & Cosson, LLP
2120 L Street, NW, Suite 520
Washington, DC 20037
Counsel for Texas RSA 1 Limited Partnership d/b/a XIT Cellular

David L. Nace
Lukas Nace Gutierrez & Sachs, Chartered
1111 Nineteenth Street, NW, Suite 200
Washington, DC 20036
Counsel for Texas RSA 8 South Limited Partnership d/b/a Wes-Tex Cellular

Glenn S. Rabin
ALLTEL Corporation
Vice President, Federal Regulatory Affairs
601 Pennsylvania Avenue, NW
Suite 720
Washington, DC 20004

Karlyn D. Stanley
Cole Raywid & Braverman LLP
1919 Pennsylvania Avenue, NW
Suite 200
Washington, DC 20006-3458
Counsel for Centennial Communications Corporation

David Kaufman
Brown Nietert & Kaufman, Chartered
2000 L Street, NW, Suite 817
Washington, DC 20036
Counsel for Commnet of Delaware L.L.C.

David L. Nace
Lukas Nace Gutierrez & Sachs, Chartered
1111 Nineteenth Street, NW, Suite 200
Washington, DC 20036
Counsel for Kentucky RSA 4 Cellular General Partnership

Sylvia Lesse
Kraskin Lesse & Cosson, LLP
2120 L Street, NW, Suite 520
Washington, DC 20037
Counsel for Pine Belt Cellular, Inc. d/b/a Pine Belt Wireless

James Williams
South Canaan Cellular Communications Co.
Director of Operations
12800 University Drive
Fort Myers, Florida 33907

David L. Nace
Lukas Nace Gutierrez & Sachs, Chartered
1111 Nineteenth Street, NW, Suite 200
Washington, DC 20036
Counsel for Yorkville Communications, Inc.

David L. Nace
Lukas, Nace, Gutierrez & Sachs
1111 19th Street, NW, Suite 1200
Washington, DC 20036
Counsel for Tennessee RSA No. 3 Limited Partnership d/b/a Eloqui Wireless

David L. Nace
Lukas, Nace, Gutierrez & Sachs
1111 19th Street, NW, Suite 1200
Washington, DC 20036
Counsel for Rural Cellular Corp.

Gene DeJordy
Western Wireless Corporation
Vice President, Regulatory Affairs
3650 131st Avenue Se
Bellevue, Washington 98006

Timothy Welch
Hill & Welch
1330 New Hampshire Avenue, NW
Suite 113
Washington, DC 20036
Counsel for Northeast Communications of Wisconsin, Inc. d/b/a Cellcom

David L. Nace
Lukas, Nace, Gutierrez & Sachs
1111 19th Street, NW, Suite 1200
Washington, DC 20036
Counsel for Rural Cellular Association

Robert M. Jackson
Blooston, Mordkofsky, Dickens Duffy & Prendergast
2120 L Street, NW, Suite 300
Washington, DC 20037
Counsel for CC Communications

Robert A. Geilich
Lucent Technologies, Inc.
67 Whippany Road
Room 3B-210
Whippany, NJ 07981

/S/ Felicia Lane
Felicia Lane

*Hand Delivery